

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: :
Chad Williams : Case No.: 18-13585(MDC)
Debtor : Chapter 13

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtor, Chad Williams, by and through his undersigned counsel, hereby move to modify his Chapter 13 Plan and in support thereof aver as follows:

1. Chad Williams, hereinafter referred to as “Debtor,” filed a petition under Chapter 13 Bankruptcy on or about May 31, 2019.
2. The Chapter 13 filing was assigned case number 18-113585MDC.
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about October 24, 2019.
4. Due to COVID-19, the Debtor, who owns a restaurant, has suffered a loss of income.
5. This reduction in income has resulted in the Debtor falling behind on his Chapter 13 payments.
6. Pursuant to the recently enacted CARES Act, Debtor has experienced a material financial hardship, directly or indirectly caused by the COVID-19 virus.
7. Debtor’s Plan was originally Confirmed prior to March 27, 2020.
8. In light of this, and to avoid dismissal of his case, Debtor is humbly requesting that he be allowed to modify and extend his Chapter 13 Plan to 7 years.

9. This plan remains a pro rata payback to unsecured creditors. (See proposed modified plan marked as "**Exhibit A**").

WHEREFORE, the Debtor requests that he be permitted to modify his Chapter 13 Plan for the above-stated reasons.

Dated: April 30, 2020

/s/Brad J. Sadek, Esq.
Brad J. Sadek, Esq.
Attorney for Debtor
1315 Walnut Street, #502
Philadelphia, PA 19107
215-545-0008